

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ROSA M. GUEVARA ORTIZ; MARGARITA GRACIA;
LOURDES HUERTAS; MAGALIE CRISPIN;
MARIA BETANCOURT; HERNAN VILLANUEVA;
WILLIAM LEON FIGUEROA; VICTOR ILARRANZA;
FRANCISCO PADILLA; MAYRA I. BERRIOS;
RICARDO OTERO PIZARRO; LUIS ORLANDO
BERRIOS; GERALDO CLEMENTE; FELIPE DIAZ
MELENDEZ; MILDRED ESPINOSA AVILES;
CHRISTIAN MARTINEZ; CARMEN RASPALDO;
MARY Y. NAVARRO SANTIAGO and ALFREDO
GOVEO MONTAÑEZ

Plaintiffs
v.

UNIÓN INDEPENDIENTE DE EMPLEADOS
TELEFÓNICOS ("UIET") and MYRIAD BENEFITS
INCORPORATED

Defendants.

CIVIL NO.: 18-1729 (WGY)

BREACH OF FIDUCIARY
DUTIES

TRIAL BY JURY REQUESTED

MOTION FOR EXTENSION OF TIME
TO ANSWER COMPLAINT OR OTHERWISE PLEAD

TO THE HONORABLE COURT:

COMES NOW co-defendant, Union Independiente de Empleados Telefónicos, hereinafter, UIET, through the undersigned counsel, and very respectfully states and prays as follows:

1. On September 28, 2018 Plaintiffs, Rosa M. Guevarra Ortiz, Margarita Gracia, Lourdes Huertas, Magalie Crispin, Maria Betancourt Hernan Villanueva, William leon Figueroa, Victor Ilarranza, Francisco Padilla, Mayra I. Berrios, Ricardo Otero Pizarro, Luis Orlando Berrios, Geraldo Clemente, Felipe Diaz Melendez, Mildred Espinosa Raspaldo,

Motion for Extension of Time to Answer Complaint or Otherwise Plead
Civil No.: 18-1729 (WGY)

Mary Y. Navarro Santiago and Alfredo Goveo Montañez, filed a Complaint before this Court against defendants. Co-Defendant UIET was served with process on October 4, 2018. Pursuant to Fed. R. Civ. P. 12 the answer to Plaintiffs' Complaint is due on October 25, 2018.

2. Co-Defendant, UIET, has recently retained the services of the undersigned attorney for this case. This attorney is in the process of analyzing the allegations made in the Complaint and investigating the facts related to this action.

3. Pursuant to Local Civil Rule 6, "the clerk is authorized to enter orders granting a first extension of time, provided it encompasses a period not to exceed thirty (30) days." L. Civ. R. 6. Thus, co-defendant UIET respectfully request a first extension of thirty (30) days, that is, until Wednesday, November 21, 2018, to answer the Complaint or otherwise plead.

4. It is respectfully submitted that this request is reasonable, made in good faith, and without the intention of delaying the proceedings in this case.

WHEREFORE, Co-Defendant, UIET, respectfully requests a first extension of time of thirty (30) days, that is, until Wednesday, November 21, 2018, to answer the Complaint or otherwise plead.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22th of October, 2018

Motion for Extension of Time to Answer Complaint or Otherwise Plead

Civil No.: 18-1729 (WGY)

S/ Neyza Román Rivera
Neyza Román Rivera, Esq.
ATTORNEY FOR THE CO-DEFENDANT UIET
PO Box 192408
San Juan, PR 00919-2408
Telephone: 787-249-3442
Facsimile: 787-773-1113
Email: nroman@hrlegalpro.com
USDC-PR Attorney No.: 302603